

Fill in this information to identify your case:

United States Bankruptcy Court for the:

SOUTHERN DISTRICT OF TEXAS

Case number (if known) Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

4/19

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Matra Terra, LLC

2. All other names debtor used in the last 8 years
Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 83-3219069

| 4. Debtor's address | Principal place of business | Mailing address, if different from principal place of business |
|---------------------|--|---|
| | 708 Main St., Floor 9 Houston, TX 77002 Number, Street, City, State & ZIP Code | |
| | Harris County | Location of principal assets, if different from principal place of business Borger, TX Number, Street, City, State & ZIP Code |

5. Debtor's website (URL)

6. Type of debtor
☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other. Specify:

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. *Check all that apply:*

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,725,625 (amount subject to adjustment on 4/01/22 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

| | | | | | |
|----------|-------|------|-------|-------------|-------|
| District | _____ | When | _____ | Case number | _____ |
| District | _____ | When | _____ | Case number | _____ |

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- ☐ No
- ☒ Yes.

List all cases. If more than 1, attach a separate list

| | | | |
|----------|-----------------------|-----------------------|-------|
| Debtor | See Attachment | Relationship | _____ |
| District | _____ | When | _____ |
| | | Case number, if known | _____ |

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard?

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other

Where is the property?

Number, Street, City, State & ZIP Code

Is the property insured?

☐ No

☐ Yes. Insurance agency

Contact name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

15. Estimated Assets

☐ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☐ \$1,000,001 - \$10 million

☒ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☒ \$1,000,001 - \$10 million

☐ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

Debtor **Matra Terra, LLC**
Name

Case number (if known)

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **July 31, 2019**
MM / DD / YYYY

X /s/ **Drew McManigle**
Signature of authorized representative of debtor

Drew McManigle
Printed name

Title **Chief Restructuring Officer**

18. Signature of attorney

X /s/ **Melissa A. Haselden**
Signature of attorney for debtor

Date **July 31, 2019**
MM / DD / YYYY

Melissa A. Haselden
Printed name

Hoover Slovacek LLP
Firm name

**5051 Westheimer
Suite 1200
Houston, TX 77056**
Number, Street, City, State & ZIP Code

Contact phone **713.977.8686**

Email address **haselden@hooverslovacek.com**

00794778 TX
Bar number and State

Debtor **Matra Terra, LLC**
Name

Case number (if known)

Fill in this information to identify your case:

United States Bankruptcy Court for the:
SOUTHERN DISTRICT OF TEXAS

Case number (if known) Chapter **11**

☐ Check if this an amended filing

FORM 201. VOLUNTARY PETITION
Pending Bankruptcy Cases Attachment

| | | | |
|-----------------------|---|---------------------|-----------------------|
| Debtor | Matra Petroleum Oil & Gas, LLC | Relationship to you | Affiliate |
| District | Southern District of Texas | When | |
| Case number, if known | | | |
| Debtor | Matra Petroleum Operating, LLC | Relationship to you | Affiliate |
| District | Southern District of Texas | When | |
| Case number, if known | | | |
| Debtor | Matra Petroleum USA, Inc. | Relationship to you | Parent Company |
| District | Southern District of Texas | When | |
| Case number, if known | | | |

**WRITTEN CONSENT OF THE MANAGER
OF MATRA TERRA, LLC**

The undersigned, being the Manager of Matra Terra, LLC, a Delaware limited liability company duly authorized to conduct business in the state of Texas (the "Company"), and pursuant to the provisions of the Delaware statutes and Company Agreement, hereby consents to the adoption of the following resolutions and to the action authorized in such resolutions being taken by the Manager in lieu of a meeting thereof:

RESOLVED, that the Company should reorganize by filing for bankruptcy protection under Chapter 11 of the Bankruptcy Code with an appropriate federal bankruptcy court sitting in Harris County, Texas;

RESOLVED, that MACCO Restructuring Group, LLC, is authorized to act as Financial Advisor and Drew McManigle is designated as Chief Restructuring Officer of the Company ("Company Representative") and is hereby authorized and directed to prepare or cause to be prepared the voluntary petition and to cause the initiation and prosecution of a case under the Bankruptcy Code (the "Bankruptcy Case"), and to prepare or cause to be prepared all other documents, pleadings and other others instruments necessary to prosecute the Bankruptcy Case;

RESOLVED, that the Company is authorized and directed to employ and retain the firm of Hoover Slovacek LLP, Attorneys at Law, to represent the Company in its case under the Bankruptcy Code upon such retainer and compensation agreement as may seem in the sole discretion of the Company Representative or Manager to be appropriate; and

RESOLVED FURTHER, that any and all actions taken by the Company Representative or Manager, for and on behalf and in the name of this Company, prior to the adoption of the foregoing resolutions, in connection with any of the foregoing matters, be and they are hereby, ratified, confirmed and approved in all respects for all purposes.

The undersigned, being the Manager of the Company hereby consents to the foregoing effective the 17 day of July, 2019.

**MATRA TERRA LLC,
a Delaware limited liability company**

By: 
Maxim Barsky, Manager

Fill in this information to identify the case:

Debtor name

Matra Terra, LLC

United States Bankruptcy Court for the:

SOUTHERN DISTRICT OF TEXAS

Case number (if known):

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

| Name of creditor and complete mailing address, including zip code | Name, telephone number and email address of creditor contact | Nature of claim (for example, trade debts, bank loans, professional services, and government contracts) | Indicate if claim is contingent, unliquidated, or disputed | Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim. | | |
|--|--|---|--|--|---|-----------------|
| | | | | Total claim, if partially secured | Deduction for value of collateral or setoff | Unsecured claim |
| Vladimir Lenskiy 969 North St. Greenwich Greenwich, CT 06831 | | Pending Litigation | Contingent Unliquidated Disputed | | | \$2,476,039.49 |

**United States Bankruptcy Court
Southern District of Texas**

In re Matra Terra, LLC

Debtor(s)

Case No.
Chapter

11

VERIFICATION OF CREDITOR MATRIX

I, the Chief Restructuring Officer of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: July 31, 2019


/s/ Drew McManigle
Drew McManigle/Chief Restructuring Officer
Signer/Title

Texas Workforce Commission
Bankruptcy Section
P O Box 149080
Austin, TX 78714-9080

Texas Comptroller of Public Accounts
Revenue Accounting Division
Bankruptcy Section
P O Box 12548
Austin, TX 78711-2548

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service - Houston
Insolvency Section
1919 Smith MAIL STOP HOU 5022
Houston, TX 77002

Carson County Appraisal District
102 S. Main St.
Panhandle, TX 79068

Gray County Appraisal District
815 N. Sumner Street
Pampa, TX 79065-5232

Gray County Appraisal District
P.O. Box 836
Pampa, TX 79066-0836

Hutchinson County Tax Assessor
500 Main St., Suite 201
Stinnett, TX 79083

JOA?

Melody Business Finance, LLC
60 Arch Street, 2nd Floor
Greenwich, CT 06830

Melody Business Finance, LLC
c/o Jennifer Hardy
Willkie Farr & Gallagher LLP
600 Travis Street
Houston, TX 77002

Montague County Tax Appraisal District
P.O. Box 121
Montague, TX 76251

Montague County Tax Appraisal District
7549 State Hwy 175
Montague, TX 76251

Perdue Brandon Fielder Collins & Mott
P O Box 9132
Amarillo, TX 79105-9132

Shelby County Appraisal District
724 Shelbyville Street
Center, TX 75935

Stephens County Tax Appraisal District
PO BOX 351
Breckenridge, TX 76424

Vladimir Lenskiy
969 North St. Greenwich
Greenwich, CT 06831

Vladimir Lenskiy
c/o Logan E. Johnson
Schiffer Hicks Johnson, PLLC
700 Louisiana, Suite 2650
Houston, TX 77002

Vladimir Lenskiy
c/o Misty Segura
Cokinos
1221 Lamar Stree, 16th Floor
Houston, TX 77010-3039